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November 30, 2016

Via ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
District Court of New Jersey
Martin Luther King Building & U.S. Court
50 Walnut Street
Newark, NJ 07101

Re: CGB v. Santa Lucia, Khorozian, et al.
Civil Action No. 2:15-CV-03401-CLW
Our File No. 6054-04

Dear Judge Wettre:

As you will recall, this office represents Defendant Aida Santa Lucia in the aforementioned matter. Please accept this letter brief in lieu of a more formal submission in response to plaintiff's Certification, with exhibits, in opposition to defendants' request to file a motion to seal documents. (ECF 83). Defendant Aida Santa Lucia did not file the original application and has not made any additional submissions with respect to that motion. In light of the specific references in plaintiff's submission to the representations made by Defendant Aida Santa Lucia as well as references to representations made by counsel on behalf of Defendant Aida Santa Lucia, it is respectfully requested that this Court consider the following letter brief in response to plaintiff's Certification.

Plaintiff has provided a Certification which extensively outlines litigation venued in the State of Florida. Furthermore, counsel has attached documents obtained from that litigation, never before produced in this matter. Defendant Aida Santa Lucia has responded to interrogatories as well as document demands made in this matter and has produced many documents, including, but not limited to, her United States Passport, European Passport, cover page to her Visa, birth record and Florida Identification Card. The Marriage Certificate of Varoujan Khorozian and Angela Santa Lucia has also been produced. The certified answers to discovery with documents and sworn deposition testimony are the only representations that have been made in this

November 30, 2016

Page 2 of 3

matter by Defendant Aida Santa Lucia and counsel. While plaintiff's counsel may seek to continually focus only on arguments pertaining to the identity of Aida Santa Lucia, to suggest that defense counsel has made any false representations is improper and inaccurate.

Plaintiff's counsel, once again, focuses only on the so called identity issue involving Aida Santa Lucia and her twin sister Angela Khorozian. As is set forth in the letter submission dated November 15, 2016 on behalf of Defendant Aida Santa Lucia (sent via email), this issue has absolutely no relevancy to the claims of the plaintiff. It is an ancillary issue meant to deflect this Court's attention from the true issues in this case which involve the relationship of Defendant Aida Santa Lucia and plaintiff in Cameroon as well as in the United States. Defendant Aida Santa Lucia has never denied that it was she who, in fact, had a relationship with the plaintiff. Plaintiff's counsel has demonstrated a clear disinterest in addressing the actual merits of plaintiff's claims, or lack thereof, and has still failed to present any evidence to support any of the claims asserted in the Complaint.

A reading of the transcript of the deposition of Defendant Aida Santa Lucia confirms that plaintiff's counsel's sole focus is the identity of Defendant Aida Santa Lucia and essentially no, or very few questions, were asked that in any way bear any relevance to the claims being asserted on behalf of the plaintiff. In fact, plaintiff's counsel refuses to respond to any requests to coordinate depositions of witnesses identified in this matter. Counsel for the Khorozian defendants is attempting to coordinate the depositions of the witnesses from Africa which require confirmation of dates to which plaintiff has not provided a response. Additionally, counsel on behalf of Defendant Aida Santa Lucia requested that plaintiff's counsel confirm whether they will produce their identified witnesses, Elbert Elomo, Angele Nbassi and Marie Therese voluntarily or whether a subpoena is required. Counsel has not responded to this request. Additionally, we are attempting to coordinate the deposition of the housekeeper at the Khorozian home, Steve Houston, and have again requested input from plaintiff's counsel as to dates of availability. Once again, counsel has refused to respond. These depositions are now being scheduled without the input of plaintiff's counsel. This matter cannot be continually sidetracked from the discovery that actually addresses the claims asserted by plaintiff without any support. On behalf of defendant Aida Santa Lucia, I respectfully join in the request of counsel for the Khorozians for a detailed scheduling order compelling the plaintiff's cooperation in discovery.

November 30, 2016

Page 3 of 3

I thank Your Honor for your kind consideration of this matter.

Respectfully submitted,

MAYFIELD, TURNER, O'MARA & DONNELLY

s/Christine D. McGuire

BY: _____

LINTON W. TURNER, JR.

CHRISTINE D. McGUIRE

CDM/kmd

Cc: Victoria J. Airgood, Esquire

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